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January 30, 2012

VIA ELECTRONIC FILING

Hon. William D. Wall, U.S.M.J.
United States District Court
Eastern District of New York
100 Federal Plaza
P.O. Box 9014
Central Islip, NY 11722-9014

Re: Zirogiannis v. Fein, Such & Crane, LLP, et al.
Civil Action No. 2:10-cv-1657

Dear Judge Wall:

This firm represents defendants Fein, Such & Crane, LLP ("FSC"), and Fein, Such, Kahn & Shepard, P.C. ("FSKS"), relevant to the above matter. FSC and FSKS are in the process of responding to discovery responses by Plaintiff and respectfully request, with the consent of all parties, that the Court enter the attached Confidentiality Stipulation and Qualified Protective Order ("Stipulation and Order") relevant to certain discovery sought in this matter, which arises from claims under the Fair Debt Collection Practices Act, 15 U.S.C. 1692 et seq. ("FDCPA"). Specifically, Plaintiff seeks certain information relevant to the business operations, business procedures and net worth of the respective defendants in this matter, as set forth in paragraph 1 of the attached Stipulation and Order. The undersigned has consulted with counsel for Plaintiff and co-defendant Relin, Goldstein & Crane, LLP, and has obtained their consent for entry of the attached Stipulation and Order.

FSC and FSKS maintain that information identified above and within the attached Stipulation and Order is private and confidential and that there is no public interest in obtaining such business documents. FSC and FSKS further maintain that they would suffer substantial and

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specific harm should such information be disclosed in contradiction to the attached Stipulation and Order. FSC and FSKS further believe that entry of the attached Stipulation and Order will promote the free exchange of certain documents and information, will greatly diminish the involvement of the Court in discovery proceedings and will move the case along more rapidly and at less cost.

In light of the foregoing, and given the consent of all parties, it is respectfully requested that the Court enter the attached Stipulation and Order.

Respectfully submitted,

/s/ Andrew C. Sayles

Andrew C. Sayles (AS4022)

ACS/acs
Enclosure(s)

cc: Daniel A. Edelman, Esq. (via ECF)
Christopher B. Hitchcock, Esq. (via ECF)